

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

**RESPONSES TO SECOND SET OF INFORMATION REQUESTS OF THE  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE TO THE  
STATE 911 DEPARTMENT**

**D.T.C. 23-2  
May 05, 2023**

**Responsible Person: Frank Pozniak**

**D.T.C. 2-1 Provide an updated Exhibit A showing year-to-date actual expenditures for  
FY 2023.**

**RESPONSE:**

**Exhibit A has been updated and attached to show year-to-date actual expenditures as of April 30, 2023.**

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D.T.C. 2-2 Refer to 23-1 D.T.C. IR 1-1 and 22-1 D.T.C. IR 1-1, explain:

a) The increase in the number of prepaid subscribers by 40 percent;

**RESPONSE:**

As the subscriber counts are reported by the service providers and there is no means known to the 911 Department to validate these counts, the 911 Department can offer that the increase may be attributable to one or more of the following:

- Service Provider previously remitted as wireless in error;
- Service Provider changed the method of calculation used to determine the number of subscribers;
- Fluctuations with consumers/industry/reporting; and/or
- Data entry error in the 911 Department's database.

b) The decrease in the number of wireline subscribers by 23 percent;

**RESPONSE:**

As the subscriber counts are reported by the service providers and there is no means known to the 911 Department to validate these counts, the 911 Department can offer that the decrease may be attributable to one or more of the following:

- Service provider previously remitted as wireline in error;
- Consumer move away for wireline service;
- Fluctuation in the industry/reporting; and/or
- Data entry error in the 911 Department's database.

c) The number of prepaid subscribers has increased by 40 percent yet the revenue from the prepaid subscribers has increased by only three percent;

**RESPONSE:**

There may not be a one-to-one correlation between subscriber counts and application of the surcharge rate as it relates to pre-paid service providers. Pre-paid carrier can either report the actual number of subscribers or report the subscriber counts based upon the average revenue per user.

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d) The number of wireline subscribers has decreased by 23 percent yet the revenue from the wireline subscribers has decreased by only 11 percent.

**RESPONSE:**

There is not a one-to-one correlation between subscriber counts and application of the surcharge revenue as it relates to wireline service providers. Under a previous expired regulation (220 CMR 16) the D.T.C. had established a station-to-trunk equivalency ratio to be applied to Centrex service (9:1) and ISDN PRI service (5:1). Application of these ratios may account for this discrepancy. Although no longer in effect as a subsequent ratio has not been established, service providers still utilize the expired equivalency ratios.

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D.T.C. 2-3 Refer to the 911 Department's response to D.T.C 1-1, explain the decrease in the number of subscribers projected for FYs 2024-2027 compared to FY 2023.

**RESPONSE:**

The 911 Department utilizes the currently available subscriber counts at the time projections are being compiled. Thus, the subscriber counts utilized for projections are a snapshot in time. Those counts used for the FY 2023 projections were the subscriber counts as of June 30, 2022. When compiling projections for FY 2024 – 2027 subscriber counts as of December 30, 2022 were utilized, as that was most current count available.

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D.T.C. 2-4 Refer to the 911 Department's response to D.T.C. 1-1, please state whether the monthly per subscriber surcharge revenue amount received for different types of providers is the same and, if not, please explain the reason for the difference.

**RESPONSE:**

The surcharge rate of \$1.50 per subscriber is applicable to all service providers. However, as noted above in the response to D.T.C. 2-2, there are different calculation methods that can be utilized to determine the surcharge that is remitted to the 911 Department.

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D.T.C. 2-5 Refer to the 911 Department's response to D.T.C 1-3, provide the amount of actual invested funds for FY 2022 and the projected amount of invested funds for FY 2023-2027.

**RESPONSE:**

The chart below lists the funds invested as of the close of FY 2022 and the projected invested funds as of the close of FY 2023 – 2027.

Fiscal Year	Invested Funds
2022	\$100,356,235
2023	\$156,282,863
2024	\$71,148,139
2025	\$28,641,938
2026	\$29,645,860
2027	\$0

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D.T.C. 2-6 Refer to the 911 Department's responses to D.T.C. 1-6 (b) and (f). Explain how Motorola and SigCom were selected as vendors for the mentioned upgrades and whether there is an estimate of the unit price of each equipment/system mentioned.

**RESPONSE:**

The 911 Department requested quotes from applicable vendors on statewide contract PSE01: Public Safety Equipment and Two-Way Radio - category 5: Two-way radio equipment, supplies and services. The request for quotes was published via Commbuys (BD-23-1044-EPS90-1044E-78630). Motorola was the sole respondent and therefore they were the selected vendor.

The 911 Department has not yet conducted a procurement for the replacement of the current fire station alerting system. The mention of SigCom TRX50 is for reference only. The 911 Department will allow for equivalent systems to be bid when it releases the request for quotes under statewide contract PSE01: Public Safety Equipment and Two-Way Radio - category 1: Fire equipment, Supplies and Services.

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D.T.C. 2-7 Refer to Exhibit B, explain the functional difference between the radio equipment under Capital Projects, Administration, compared to the radio equipment under Radio Infrastructure Project, 911 Administration and Operation.

**RESPONSE:**

The radio equipment noted under Capital Projects is for radio consolettes at the North Shore Regional 911 Center that are not part of the CoMIRS project. The Radio Infrastructure Project noted under 911 Administration and Operation is strictly the CoMIRS project.



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D.T.C. 2-8 Refer to D.T.C. 22-1, Exhibit A, the cost of relocating the wireless center was estimated to be \$500,000 in FY 2021. Based on the 911 Department's 2023 petition, it appears the wireless and training centers are being relocated to Milford, Massachusetts. Based on the 911 Department's answer to D.T.C. 1-6 (d) the cost of relocation of these two centers is now estimated to be \$6.8 million in FY 2024. Explain the reasons for the increase in relocation cost of these two centers when the relocation of the wireless center alone was estimated to be \$500,000.

**RESPONSE:**

The construction cost estimate contained in the response to D.T.C. 1-6(d) is reflected in the executed Form 3 and lease for the 31 Maple Street location in Milford and includes a one-time payment for the construction build out, thereby reducing the cost of the lease over the ten year agreement, at that location for the 911 Department's two centers, as well as for the space that will be occupied in the building by two other Commonwealth agencies - the Massachusetts Police Training Council and the Department of Correction. The building is a two-story building with the 911 Department occupying the first floor, and the other two agencies occupying the second floor. The 911 Department will be entering into a cost sharing arrangement with both those agencies for their portion of the construction. The furnishing and equipment cost estimate included in D.T.C. 1-6(d) is solely for the 911 Department and reflects our best estimate for this cost at this time.

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D.T.C. 2-9 Confirm that the method used to calculate the statutory minimum amount for the Training Grant, as mentioned in IR 1-15, is:

a) the same method used for other Grant Program statutory minimum amounts; and

RESPONSE:

Yes, this same method is used for calculation of other grant programs with statutory minimum amounts.

b) the same method used to calculate Grant Program statutory minimum amounts in previous years.

RESPONSE:

Yes, this same method was used in previous fiscal years to calculate statutory minimum amounts.

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D.T.C. 2-10 Refer to 911 Department's response to D.T.C. 1-12(a). Explain the categorization of the Patriot RECC as Priority 1 and identify the communities where an Intermunicipal Agreement is executed. Identify the primary PSAPs that have become or are becoming a part of this RECC, and in what fiscal year was each primary PSAP addition completed.

**RESPONSE:**

The Patriot RECC was included in Priority 1 at the time because it was expanding with the addition of Townsend to the RECC with an executed Intermunicipal Agreement. The Patriot RECC, which is located in Pepperell, provides 9-1-1 service for three communities, Pepperell, Ashby, and Townsend. The Patriot RECC first formed with Ashby in FY 2020, and Townsend was added in FY 2022.

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D.T.C. 2-11 Define the Architectural & Engineering, Construction, Debt Services, Equipment, Professional Services, Project Management, Transition Expenses subcategories for the Development Grant awards, as used in response to D.T.C. 1-12(a) and 1-13(a). Explain the significance of the strikethrough/red text, and the reasons for why a Purpose spending category would be indicated as such.

**RESPONSE:**

Below are excerpts from the FY 2023 Development Grant guidelines that provide additional information relative to the requested cost categories. The strikethrough/red text indicates where an applicant applied for funding in a cost category that was not funded as part of the applicant's award.

**Architectural and Engineering Services**

Existing and proposed regional PSAPs, regional secondary PSAPs, and RECCs, and the Northampton wireless state police PSAP, are eligible to apply for funds for architectural and engineering services to support construction of new or expansion of existing regional PSAPs, regional secondary PSAPs, and/or RECCs.

Allowable items to be funded through this grant include architectural and engineering services, including creation of specifications, blueprints, floor plans, etc.

**Construction**

Existing and proposed regional PSAPs, regional secondary PSAPs, and RECCs, and the Northampton wireless state police PSAP, are eligible to apply for funds to support construction of new or expansion of existing regional PSAP, regional secondary PSAP, and/or RECCs.

The applicant shall demonstrate that it has exhausted all suitable alternatives for existing buildings in the geographic area of the applicant and the proposed new building is more cost effective than any such existing building in the geographic area of the applicant. In its review the State 911 Department reserves the right to consider the concentration of existing or proposed regional PSAPs and RECCs in the geographic region of the applicant, and whether it is in the interests of public safety and efficiency for the State 911 Department to direct the applicant to join such existing or proposed regional PSAP or RECC instead of seeking new construction.

Allowable items to be funded through this grant include:

- Construction materials;
- Plumbing, electrical and cabling materials;

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- Labor;
- Other construction or structural improvement items; and
- Consultant services.

The structure as built shall be fully compliant with all building codes, including but not limited, to the Americans with Disabilities Act Accessibility Guidelines found at [http://www.ada.gov/2010ADAstandards\\_index.htm](http://www.ada.gov/2010ADAstandards_index.htm) and the Massachusetts Architectural Access Board Rules and Regulations found at <http://www.mass.gov/eopss/architectural-access-board.html>. All construction items funded through this grant shall only be permitted to fund construction and structural improvement costs to physical space used directly for the provision of enhanced 9-1-1 service. Such funds may be used to defray costs associated with construction or structural improvement of a multi-purpose building only to the extent that such funding is applied to a specific portion of the building's total space that is dedicated to the provision of enhanced 9-1-1 service. For example, if a municipality is building a new fire station that will include a regional secondary PSAP, funds may be applied to cover costs associated with constructing only that portion of the building that will house the PSAP. The applicant shall submit blueprints, detailed floor plans and any additional and available supporting documentation and the identification and contact information of a project manager.

**Debt Service**

The State 911 Department will allow funding for the purchase or lease of equipment, allowable construction items, and allowable structural improvement items and for debt service on equipment, allowable construction items, and allowable structural improvement items, including without limitation, principal and interest payments on loans, notes, and bonds. The State 911 Department will allow grantees to assign lease, debt service, and/or incremental purchase costs to this grant.

**Equipment**

Existing and proposed regional PSAPs, regional secondary PSAPs, and RECCs, and the Northampton wireless state police PSAP, are eligible to apply for funds for equipment associated with the provision of enhanced 9-1-1 service and that is not directly provided by the State 911 Department and/or equipment to be used to foster the development and startup of regional PSAPs, regional secondary PSAPs, and RECCs or the expansion or upgrade of existing regional PSAPs, regional secondary PSAPs and RECCs.

Allowable items to be funded through this grant include, but are not limited to:

- Radio systems;
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- CAD;
- Records management systems;

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- Fire alarm receiving and alerting equipment; and
- Consultant services in support of equipment.

**Professional Services**

Existing primary PSAPs, and existing and proposed regional PSAPs, regional secondary PSAPs, and RECCs, and the Northampton wireless state police PSAP, are eligible to apply for funds for professional services to assist with the planning, development and/or expansion of the proposed or existing regional PSAP, regional secondary PSAP or RECC, including implementation studies, development of governance agreements, and financial, operational, and/or technological assessments.

Professional services provided by existing PSAP staff, public safety departments, municipalities, or governmental bodies will not be funded, unless the grantee demonstrates that the person has a demonstrated level of expertise in the field of services to be provided and provides detailed documentation, to the satisfaction of the State 911 Department, supporting the professional services (including, without limitation, the time and dollar amount for professional services on the project).

The State 911 Department encourages grantees receiving funds for professional services to require, through the scope of work between the grantee and the consultant, that the work includes specific deliverables and sufficient detail on the applicable technical, operational and/or governance issues, so as to enable the grantee to fully evaluate the scope of establishing and/or implementing a new regional PSAP or RECC, or expanding an existing regional PSAP or RECC.

The State 911 Department encourages grantees receiving funds for professional services to consider requesting the consultant, through the scope of work between the grantee and the consultant, to evaluate and analyze some or all of the following operational, technical, and/or governance matters, as applicable:

- Operational benefits and cost effectiveness among the options being considered, including without limitation, analysis of the use of existing versus new structures and cost analysis of joining an existing or proposed regional PSAP or RECC in the same geographic region; up-front and/or recurring operational costs savings, if any, taking into account State 911 Department Grant funding; start-up costs, including without limitation, construction costs, building design, location, square footage of dispatch and server rooms (with consideration of expansion capability), renovation of existing/new structure, and additional costs, if any; identification of financial resources available to provide ongoing support for the project so that it may be sustainable into future years.
- Staffing (including for ancillary duties) analysis and review of personnel structures and costs at each entity, including analysis of the core and additional services provided by current personnel

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and estimated personnel costs for staffing a regional PSAP or RECC, along with costs to maintain or increase other public safety services at existing local agencies.

- Technological assessment: Interoperability and compatibility (per location or centralized) of dispatch equipment, including without limitation, radio, telephone, and other equipment.

**Project Management Services**

Allowable expenses to be funded through this grant include:

- Project management services of the designated project manager engaged to manage the project. Project management services provided by existing PSAP staff, public safety departments, municipalities, or governmental bodies will not be funded unless the grantee provides detailed documentation, to the satisfaction of the State 911 Department, supporting the project management services (including, without limitation, the time and dollar amount for project management services on the project).

The contract or arrangement between the grantee and the project manager should require specific deliverables (such as project plans, project schedules, project reports, draft inter-municipal or other form of agreement, etc.) The deliverables shall be provided to the State 911 Department upon request and shall also be included in the quarterly reports that are submitted to the State 911 Department.

The contract or arrangement between the grantee and the project manager should include, at a minimum, the following:

- Well organized, clear and complete statement of work;
- Identification of significant, appropriate, and quantifiable performance measures, project milestones and delivery of reports;
- Clearly identified project management roles; and
- Pricing structure/cost table.

**Transition Expenses**

**1. Personnel Costs of PSAP Director/Deputy Director**

Existing and proposed regional PSAPs, RECCs, and regional secondary PSAPs are eligible to apply for the following allowable expenses within the transition expenses category: salaries of a PSAP Director and/or PSAP Deputy Director. The State 911 Department reserves the right to require the applicant to provide documentation, to the satisfaction of the State 911 Department, that the PSAP Director and/or PSAP Deputy Director were hired through an open hiring process and that the PSAP Director and PSAP Deputy Director have a demonstrated PSAP, public safety, or call center background, or the equivalent, as well as administrative and managerial experience.

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**Proposed Centers/Newly Developed Centers:**

Proposed regional PSAPs, RECCs, and regional secondary PSAPs are eligible to apply for salary of a PSAP Director and/or PSAP Deputy Director for the proposed regional PSAP, RECC, or regional secondary PSAP for the period prior to the "go live" date (the date on which the facility is expected to become operational based upon a construction plan and timeline with supporting documentation thereof to the satisfaction of the State 911 Department). Such funding may continue through the date on which the communities identified in the inter-municipal agreement have joined the regional PSAP, RECC, or regional secondary PSAP and the facility is operational with all such communities or is operational with the communities that remain committed to and have not withdrawn commitment to the facility. Following the date on which the communities identified in the inter-municipal agreement have joined the regional PSAP, RECC, or regional secondary PSAP and the facility is operational with all such communities, such regional PSAP, RECC, or regional secondary PSAP is eligible for the salary of a PSAP Director and/or PSAP Deputy Director for three (3) twelve (12) month periods. (If a twelve (12) month period exceeds the duration of the grant cycle, the facility may apply for the balance of funding under a subsequent grant cycle).

**Existing Centers:**

Existing regional PSAPs, RECCs, and regional PSAPs that add a community(ies) to the facility after July 1, 2018 (i.e., an additional community(ies) not identified in the inter-municipal agreement has joined the facility, and the facility is operational with such community(ies) after July 1, 2018), are eligible to apply for the salaries of a PSAP Director and/or PSAP Deputy Director for the facility. Following the date on which the community(ies) identified in the inter-municipal agreement have joined the regional PSAP, RECC, or regional secondary PSAP and the facility is operational with all such community(ies), such regional PSAP, RECC, or regional secondary PSAP is eligible for the salaries of a PSAP Director and/or PSAP Deputy Director for three (3) twelve (12) month periods or two (2) twelve (12) month periods if a transition award was already applied for and awarded in the FY 2020 grant cycle pursuant to grant guidelines in effect at that time. (If the twelve (12) month period exceeds the duration of the grant cycle, the facility may apply for the balance of funding under a subsequent grant cycle).

**2. Other Personnel Costs:**

**2a. Key Support Positions**

Existing and proposed regional PSAPs, RECCs, and regional secondary PSAPs are eligible to apply for the following allowable expenses within the transition expenses category: salary of PSAP personnel in key support positions, such as information technology, human resource, finance, and/or procurement subject matter experts. The State 911 Department reserves the right to require the applicant to provide documentation, to the satisfaction of the State 911 Department, that the PSAP personnel was hired through an open hiring process and that the PSAP personnel has demonstrated knowledge and experience of position being requested.



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**2b. Certified Telecommunicators:**

**Proposed Centers:**

Proposed regional PSAPs, RECCs, and regional secondary PSAPs are eligible to apply for the costs of salary for enhanced 911 telecommunicator personnel, including enhanced 911 telecommunicators who are emergency communications dispatchers or supervisors. In order to be eligible for such funding, a grantee shall show that the personnel costs to be reimbursed: (1) cover only personnel who are trained and certified as an enhanced 911 telecommunicator in accordance with the requirements of the State 911 Department, or are in the process of obtaining such certification, in accordance with the requirements of the State 911 Department; and (2) except as otherwise approved by the State 911 Department, are solely for hours in which such personnel are working in the capacity of an enhanced 911 telecommunicator as their primary job function. Salary costs are limited to the time period prior to the "go live" date (the date on which the facility is expected to become operational based upon a construction plan and timeline with supporting documentation thereof to the satisfaction of the State 911 Department).

The State 911 Department reserves the right to require the applicant to provide documentation, to the satisfaction of the State 911 Department, that the enhanced 911 telecommunicator(s) were hired through an open hiring process.

The applicant shall include as part of its application documentation supporting the salary costs/hours being requested. Such documentation may include, but is not limited to, training curriculum, new hire manual.

**3. Training Costs:**

**Proposed Centers**

Proposed regional PSAPs, RECCs, and regional secondary PSAPs are eligible to apply for non-salary costs associated with certification and training of enhanced 911 telecommunicators. Funding may be authorized for the expense(s) of State 911 Department approved live or online training courses, and certifications/recertifications to include applicable vendor fees, course registration fees, instructor fees and/or manuals. Such costs are limited to the time period prior to the "go live" date (the date on which the facility is expected to become operational based upon a construction plan and timeline with supporting documentation thereof to the satisfaction of the State 911 Department).

Funding may be available for training courses, including on-line training, as follows: (a) State 911 Department approved courses, certifications, and training directly related to 911 communications hosted by the proposed regional PSAP, RECC or regional secondary PSAP; and (b) State 911 Department approved courses hosted by other entities.

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The State 911 Department has compiled a listing of courses previously requested by PSAPs and authorized by the Department. All courses found on this list are considered to be approved and no further advance written authorization from the State 911 Department is required. This list is not intended to limit training opportunities but is merely provided as a resource to Grantees. Please note that this list is subject to change. Classes may be added or removed by the State 911 Department.

Requests for funds for trainings not on the approved course listing as published by the State 911 Department shall be submitted utilizing the Communications In-House Training Outline form available on the State 911 Department's website at [www.mass.gov/e911](http://www.mass.gov/e911). Such requests shall be submitted by Grantee's authorized signatory at least twenty-one (21) days prior to the commencement of the course via email to [911DeptGrants@mass.gov](mailto:911DeptGrants@mass.gov).

**4. Transition Award**

Existing and proposed regional PSAPs and RECCs are eligible to apply for funds for the following allowable items within the transition expenses category:

- Transition award, payable to the entity that operates a regional PSAP or RECC on behalf of the participants, for each PSAP that is decommissioned on or after January 1, 2016, but before July 1, 2018, and becomes operational as a participant in such regional PSAP or RECC, in an amount that represents the following: the lesser of a) the last allocation for the decommissioned PSAP under the State 911 Department Support Grant; or b) the amount of the assessment or charge allocated to such PSAP for the current fiscal year under the terms of the signed inter-municipal agreement or other equivalent agreement governing the operations of the regional PSAP or RECC. Such transition award(s) shall be credited against the obligation of the decommissioned PSAP(s) by the grantee. A decommissioned PSAP may be provided with the credit twice to be applied for in two (2) different grant cycles.
- Transition award, payable to the entity that operates a regional PSAP or RECC on behalf of the participants, for each PSAP that is decommissioned on or after July 1, 2018, and becomes operational as a participant in such regional PSAP or RECC, in an amount that represents the following: the greater of a) the last allocation for the decommissioned PSAP under the State 911 Department Support Grant; or b) the amount of the assessment or charge allocated to such PSAP for the current fiscal year under the terms of the signed inter-municipal agreement or other equivalent agreement governing the operations of the regional PSAP or RECC. Such transition award(s) shall be credited against the obligation of the decommissioned PSAP(s) by the grantee. A decommissioned PSAP may be provided with the credit three (3) times to be applied for in three (3) different grant cycles, or two (2) times to be applied for in two (2) different grant cycles if a transition award was already applied for and awarded in the FY 2020 grant cycle pursuant to grant guidelines in effect at that time. After applying for and being awarded a transition award a total

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of three (3) times, a decommissioned PSAP may be provided with a credit an additional two times to be applied for in two (2) different grant cycles, but the award will be limited the first time to 50% of the greater of a) the last allocation for the decommissioned PSAP under the State 911 Department Support Grant; or b) the amount of the assessment or charge allocated to such PSAP for the current fiscal year under the terms of the signed inter-municipal agreement or other equivalent agreement governing the operations of the regional PSAP or RECC, and limited for the second time to 25% of greater of a) the last allocation for the decommissioned PSAP under the State 911 Department Support Grant; or b) the amount of the assessment or charge allocated to such PSAP for the current fiscal year under the terms of the signed inter-municipal agreement or other equivalent agreement governing the operations of the regional PSAP or RECC. Documentation that such credit has been granted in the form of a written acknowledgment from the decommissioned PSAP shall be required prior to reimbursement. Such transition award does not apply to a PSAP already decommissioned that was part of a regional PSAP or RECC but has moved to a different regional PSAP or RECC.

**5. Security Measures**

Existing and proposed regional PSAPs and RECCs are eligible to apply for funds for the following allowable items within the transition expenses category:

Security measures (such as remote cameras, remote printers, and security doors) and one-time costs associated with the installation of such security measures.

**6. Temporary Relocation Expenses**

Existing and proposed regional PSAPs and RECCs are eligible to apply for funds for the following allowable items within the transition expenses category:

Temporary on-site relocation expenses associated with projects funded under this Grant. Such expenses may commence no earlier than sixty (60) days prior to the start of construction and may continue no later than sixty (60) days following the completion of construction.

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D.T.C. 2-12 The 911 Department has disbursed \$16,419,573 of a projected \$22,000,000 from the 2022 Development Grant. Explain if the remaining \$5,580,427 allocated to the FY 2022 Development Grant is still being disbursed and attributed to FY 2022 funds. Otherwise, explain the discrepancy between Exhibit A Development Grant FY 2022 Final Expenditure of \$15,391,816 with the \$16,419,573 amount provided in response to D.T.C. 1-13(b).

**RESPONSE:**

Projects award under the Development Grant program often take multiple fiscal years to complete. Funding awarded under the FY 2022 Development Grant program that were paid out in FY 2022 were reported as FY 2022 expenditures. FY 2022 Development Grant awardees whose projects could not be completed in FY 2022 and were therefore extended, continue to be reimbursed under the grant as awarded. As FY 2022 has closed, expenditures associated with the FY 2022 award processed in FY 2023 are recorded as PSAP Regional Development – Roll over expenses.

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D.T.C. 2-13 Refer to the 911 Department's response to D.T.C. 1-17. Explain why the Westfield RECC will be incorporated into its current Incentive Grant category in 2024, and whether this RECC is fully operational.

**RESPONSE:**

The Westfield RECC is a fully operational RECC providing 9-1-1 services for the communities of Westfield and Southwick. FY 2024 is the first full fiscal year for which it will be operational and is the reason why it is included in the Incentive Grant category in FY 2024.

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D.T.C. 2-14 Prior to the TERT Program, explain how capacity issues with 911 communications centers were addressed. Provide a description of how staffing and relief needs were identified, requested, and addressed. Also, explain why the Executive Office of Public Safety and Security, the 911 Department, and the Statewide Interoperability Coordinator determined the need for the TERT program.

**RESPONSE:**

Independent MOA's and policies address how calls are processed when a center is overwhelmed or beyond capacity. When a center is short staffed for any number of reasons, the remaining PSAP staff fills in these positions on an overtime basis and/or other local level mutual aid agreements and policies may be engaged. However, staffing shortages being experienced at PSAPs across the Commonwealth is making it more difficult for neighboring municipalities to fulfill these requests. TERT was implemented in the Commonwealth to ensure that PSAPs, adversely impacted by natural disasters, coverage for line of duty deaths and widespread illness, staff relief after major events, or other instances as approved by the Department, could remain operational and continue to provide 9-1-1 services to its residents. TERT provides trained, vetted, credentialed telecommunicators that can support any Massachusetts PSAP using an established predetermined method, supported by governance and state oversight until that PSAP can sustain its own operations once again.

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D.T.C. 2-15 Refer to the 911 Department's response to D.T.C. 1-19, stating that there are currently 52 credentialed TERT team members with a targeted goal of 65 members.

a) Specify how many members currently exist in each region; and

**RESPONSE:**

Noted below are the number of credentialed TERT team members by region. Please note these number excludes 911 Department employees credentialed as TERT members as they can be deployed statewide.

- Northeast – 10
- Central - 11
- Southeast – 20
- West – 11

b) Clarify what is meant by there being 52 credentialed TERT team members "exclusive of 911 Department employees."

**RESPONSE:**

The 911 Department has four (4) staff members that are credentialled as TERT team members. As these are employees under the direction of the 911 Department and as these costs are already included in the appropriate cost category of the 911 Department's budget, they were excluded from the overall count.

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D.T.C. 2-16 Refer to the 911 Department's response to D.T.C. 1-21. Provide a breakdown of the \$198,266 estimated cost associated with these trainings. Identify what portion of the cost is attributable to salary, stipends, and mileage. Clarify whether the figure also includes salary costs associated with the trainers offering the annual training.

**RESPONSE:**

Noted below is a breakdown of the estimated costs associated with TERT trainings. The noted salary does not include costs associated with the trainer offering the course. The training is conducted by 911 Department personnel. As these costs are noted in the appropriate cost centers within our budget they are not factored into the cost of TERT.

- Salary - \$156,146
- Mileage reimbursement - \$42,120



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D.T.C. 2-17 Refer to the 911 Department's response to D.T.C. 1-26. Describe what went into the "Moves/Adds/Changes" subcategory of NG 911 Recurring expenses as well as the variation in projections and expenditures for this subcategory.

**RESPONSE:**

"Moves/Adds/Changes" is a designation used to account for changes to the configuration and/or a location of a PSAP as well as changes to the equipment, including location, within a PSAP. The \$250,000 per year was the original amount estimated for this line item when the contract was executed. The 911 Department has seen an increase in the construction of new public safety buildings that has resulted in a greater number of moves as well as increase in regionalization activity. This activity is above and beyond that anticipated annually at the time of contract execution. As the overall contract spending falls within the projections, this particular line item has not been updated.

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D.T.C. 2-18 Refer to the 911 Department's response to D.T.C. 1-27.

a) Clarify why the replacement of digital logging recorders constitutes a separate subcategory from NG Equipment/Software and from Upgrade Applications and Appliances.

**RESPONSE:**

The NG Equipment/Software and Upgrade Application and Appliances refer to commodities that were purchased and installed by the 911 Department's Next Generation 911 service provider. These are commodities identified as items that would be coming to the end of its useful life during the renewal period. The digital logging records (DLRs) are devices that were procured in FY 2012 through a separate competitive procurement process. The 911 Department elected to note the replacement of the DLRs separate from that noted on what is referred to as "attachment T" in the executed renewal.

b) Describe what penalties were assessed in the amount of \$375,000.

**RESPONSE:**

Penalties were assessed for major system malfunctions and non-compliance with notification and escalation processes as defined within the contract.

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D.T.C. 2-19 Refer to the 911 Department's response to D.T.C. 1-28. Provide a copy of the referenced Request for Response (RFR).

**RESPONSE:**

Please see attachment D.T.C. 2-19 for the noted RFR.

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D.T.C. 2-20 Refer to the Fiscal Year 2022 CoMIRS Annual Report at page 8, as referenced by the 911 Department in its Petition at page 10. The 911 Department explains that, in 2022, it identified \$1.95 million in Fiscal Year 2018 State 911 Enhanced Fund Expenditures that should have been classified as CoMIRS network expenditures. Please provide an updated itemized breakdown of the final expenditures for Fiscal Year 2018, as most recently submitted by the 911 Department as Amended Exhibit A (submitted March 6, 2019) in DTC 19-2.

**RESPONSE:**

Noted in the table below is a breakdown of the 911 Department expenditures by project as detailed in DTC 19-2.

<b>Project</b>	<b>FY 2018 Final Expenditures</b>
Central Mass. Microwave Backhaul Upgrade	\$915,862
Southeast Mass. Microwave Backhaul Path Studies and Radio Tower Structural Analysis	\$199,169
E911/MSP Console Project	\$742,374
Project Management & Radio Project Planning Services	\$55,087
Indirect Cost Assessment	\$42,423

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D.T.C. 2-21 Refer to the 911 Department's answer to D.T.C. 1-32 where it states that the underlying delays in manufacturing and contract execution continued for the balance of the fiscal year resulting in fewer deliverables than originally planned. Explain whether the 911 Department expects this trend to continue and when, if ever, this trend will reverse itself.

**RESPONSE:**

The delays in subscriber unit manufacturing have been resolved. Of the 2,809 replacement portable subscriber units ordered, all have been received. Of the 4,177 replacement mobile subscriber units ordered, all but 870 have been received. The manufacturer has reported that the remaining 870 mobiles will be delivered prior to the end of FY2023.

Several critical components of the CoMIRS+P25 system, including equipment shelters, backup generators, and some networking equipment, have been subject to supply chain delays of up to a year. As a result of these delays, the completion of RFR milestones and the associated payments for successful completion of those milestones has been delayed. Several milestones originally planned for completion in FY2022 were delayed to FY2023. Similarly, several milestones originally forecast for FY2023 will be delayed to FY2024, resulting in the expenditure differences explained in the answer to D.T.C 1-32.

Contract negotiations for communication tower sites remain ongoing. The CoMIRS+P25 network will leverage a tower constellation comprised of both publicly and privately owned communication towers. It is these communication tower sites that will host the hardware and software that is central to virtually every deliverable and milestone. The Commonwealth has determined that the lease of private tower space is subject to both the Commonwealth's Standard Terms and Conditions and the Commonwealth's Terms and Conditions for Information Technology Contracts. As a matter of efficiency, the PMO is negotiating master service agreements with corporate tower owners doing business in the Commonwealth. Once a master agreement has been executed with a corporate tower owner, site specific lease agreements will be limited to price and local nuance. Of the master service agreements currently being negotiated, the first agreements are within weeks of possible execution. Notification of the execution of these agreements will be posted to COMMBUYS, the official procurement system of the Commonwealth of Massachusetts. This procurement may be reopened from time to time to procure bids from additional commercial tower owners and new commercial sites. The Land Mobile and Microwave Radio Communication Equipment Site and Tower Installation Rights Procurement was last reopened on February 1, 2023. That RFR solicited bids for 26 potential CoMIRS communications sites from commercial tower providers.

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As a general statement the PMO remains in constant communication with the CoMIRS Modernization Project's primary contractor, Motorola Solutions, about all matters that may influence the project schedule, including supply chain disruptions, computer chip and component availability, and labor shortages. In the event challenges are identified, strategies best suited to mitigate adverse consequences are considered and implemented.

The PMO continues to work toward full system "go live," user cutover, and the transition to the warranty period in 2026.

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D.T.C. 2-22 Refer to the 911 Department's answer to D.T.C. 1-32(b) where it states that the Department is delaying purchasing additional FCC licenses until the fixed price milestones and the associated infrastructure necessary to host those frequencies are completed and paid for. Elaborate on the fixed price milestones to which the 911 Department is referring and any timeline regarding when these milestones and associated infrastructure will be completed.

**RESPONSE:**

The majority of the FCC radio frequency (RF) licenses were applied for, coordinated, and awarded to CoMIRS in 2019 based on initial plans for the CoMIRS+P25 system. These initial licenses were intended to cover the RF needs for the planned CoMIRS+P25 system through initial deployment (IS-1) as well as through planned capacity expansion in IS-2.

Based on the Motorola Solutions response to the CoMIRS Modernization Project RFR and subsequently in detailed technical designs for the new system, changes were made to the envisioned CoMIRS+P25 system that necessitate modification of RF licenses or the licensing of new radio frequencies. These changes include adding new simulcast cells to maximize coverage in Barnstable County, in the Springfield metro area, and in the southern parts of western Massachusetts. Additionally, changes to RF antenna models and RF radiation patterns will require additional licensing changes and corresponding expenditures. The PMO decided that the most fiscally responsible path was to delay FCC RF licensing changes until all changes to Phase 1A impacting radio frequency licensing were finalized.

All frequency licensing, including microwave frequency licensing, will be coordinated with system implementation so as to not delay milestone completion and system availability. Applications for RF license changes and new licenses to support Phase 1A are expected this spring. Additional licenses may be needed to support additional phases of the system implementation.

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D.T.C. 2-23 Refer to the 911 Department's answer to D.T.C. 1-32(b). Explain in greater detail the decision to close the P01 object code by the end of FY 2023.

**RESPONSE:**

The Radio Upgrade Grant Program for all municipal grantees will be completed by the end of FY23, consequently, the P01 object code (Municipal Payments for Subscriber Units) will not be a necessary part of the budget beyond FY2023. Of the 53 municipal grantees, 47 have received their equipment, satisfied grant closeout requirements and have been issued a closeout letter. The remaining 6 have all received their equipment and are in the process of submitting compliance affirmations, purchase orders, invoices and packing slips. The PMO is actively engaged with these 6 grantees to ensure that these grants are closed out by the end of the FY 2023 accounts payable period.



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D.T.C. 2-24 Refer to the 911 Department's answer to D.T.C. 1-32(b). Explain in greater detail why the U07 object code was the more appropriate classification code as opposed to the K10 object code for radio purchase funds.

**RESPONSE:**

Pursuant to M.G.L. c.29 the Office of the Comptroller publishes a schedule of object classes and codes to be used for all Commonwealth expenditures. This publication is referred to as the Expenditure Classification Handbook. The object classes and object codes contained in the Handbook indicate the types of goods and services for which Commonwealth funds are expended. The Handbook states that the K10 object code is for "Law Enforcement and Security Equipment – For example: ... walkie-talkies...". Similarly, the Handbook states that the U07 object code is for "Information Technology (IT) Equipment Purchase – Outright purchase of computer and other information technology hardware, software, systems, peripherals, paging devices and telecommunications equipment (emphasis added)." The digital subscriber units that will operate on the CoMIRS+P25 network are far more sophisticated in technical scope and capacity than a legacy "walkie-talkie". The new subscriber units offer integrated GPS, standard and customizable encryption, "Bluetooth", texting capabilities, over-the-air-programming, and are capable of routing voice and data over broadband when recognizing poor signal strength. The CoMIRS PMO and the 911 Department acknowledge that the subscriber units may be purchased under either object code, however, mutually contend that the U07 object code is the most appropriate object code.